



June 8, 2017

Connect2Health Task Force and Federal Communications Commission

GN Docket No. 16-46 Reply to the Schools, Health, & Libraries Broadband Coalition (SHLB) Comments: Request for Comments on Broadband-Enabled Healthcare Solutions and Advanced Technologies

EveryoneOn respectfully submits these comments in response to the comments made by SHLB to the Connect2Health Task Force's request for public comments on Broadband-Enabled Healthcare Solutions and Advanced Technologies. EveryoneOn thanks the FCC for providing this opportunity to comment on this issue.

About EveryoneOn

EveryoneOn is a national nonprofit creating social and economic opportunity by connecting everyone to the Internet. Since 2012, we have connected more than 500,000 low-income people in 48 states to free and affordable home Internet service, devices, and digital literacy training. We aim to leverage the democratizing power of the internet to provide opportunity to all people in the United States — using connectivity to create social mobility for all.

Our organization has been able to attain national scale while maintaining impact on a community level due to our three-part approach: 1) working with internet service providers to create and deploy low-cost offers; 2) creating a best-in-class digital platform, which is best described as a "TurboTax for digital inclusion" that families can use to access affordable internet service, devices, and digital literacy education; 3) and maintaining a nationwide network of partners across sectors who are working on-the-ground directly in communities. No other organization has brought together such a collection of assets to bridge the digital divide.

Serving as an facilitator between low-income communities and people and internet service providers, device refurbishers, and digital literacy trainers, we also work with enrollment partners (nonprofits, schools, and other community-based organizations) across the country to better reach eligible populations. Through our digital platform, partner platforms, and relationships with internet service providers and device

refurbishers, we are able to market these affordable home internet offers and collect data in order to help people adopt the Internet and end the digital divide once and for all.

EveryoneOn would like to thank SHLB for its innovative and helpful comments. SHLB is one of the leading national advocates for the application of broadband internet to advance society and improve lives in the United States. EveryoneOn is proud to consider them an ally and friend. EveryoneOn strongly supports SHLB's efforts to modernize both policy and processes for rulemaking in regards to enhancing and improving the capacity of widespread connectivity to improve and advance healthcare. In particular, EveryoneOn would like to extend its support for SHLB's recommendations 1, 5, 8, and 9, which recommend that the FCC issue a Notice of Proposed Rulemaking (NPRM) to modernize the Rural Health Care (RHC) program, consider increasing the RHC budget, raise the cap for the Healthcare Connect Fund (HCF), and enable network sharing to allow health networks to be used by Health Care Providers (HCPs) as a cost-reduction mechanism, respectively. In addition to endorsing these suggestions, EveryoneOn strongly supports the spirit of the proposed order (FCC 16-46) and will support any further proposed initiatives that may promote the expansion and adoption of broadband internet in the home.

In order to more fully expand on the initiatives detailed in the proposed order, EveryoneOn recommends that the following strategies be implemented in order to (a) encourage deeper broadband adoption in the home and (b) ensure that all future policies and recommendations are modernized to reflect the needs of the most underserved communities, such as those rural communities specifically mentioned in the order and by SHLB.

1. Prioritize Home Broadband Access Across the Nation, Particularly in Rural Areas, to Enable Full Application of Telehealth, mHealth, and eHealth Platforms

In the recent past, EveryoneOn implored the FCC to re-approve the nine Lifeline Broadband Providers (LBPs) whose approval was revoked in early 2017. EveryoneOn strongly recommends the re-approval of Boomerang; Kajeet; SpotOn Networks, LLC; FreedomPop; KonaTel, Inc.; Applied Research Designs, Inc.; Liberty Cablevision of Puerto Rico, LLC; Wabash Independent Networks, Inc.; and, Northland Cable Television, Inc. The presence of home internet in low-income homes such as public housing authorities and rural areas, which would have been provided under the modernized Lifeline program, is essential for the full realization of advancements in telehealth, as many exorbitant healthcare expenditures are linked to chronic diseases, and may be reduced with the

application of low-cost platforms made available over the internet. Overall costs would be lowered further with the implementation of SHLB's network sharing recommendation.

In 2012, diabetes alone cost the American healthcare system roughly \$245 billion, according to the American Diabetes Association.¹ Diabetes, along with other chronic diseases such as COPD and CHF, are highly treatable and manageable at low cost when managed from the home, but become massively expensive when left untreated, leading to expensive ER visits. Remote patient monitoring, which involves connecting patients to HCPs and is particularly needed in rural areas as it may enable patients to more effectively manage their own care from home, thus decreasing overall healthcare costs.

The benefits of even this simple application of telehealth will be largely unrealizable without affordable internet available in the homes of those most in need. These patients could benefit from modernized Lifeline provisions, specifically the inclusion of internet costs into the Universal Service Fund (USF) categories. EveryoneOn views this recommendation as being in concert with SHLB's recommendation to increase the RHC budget as well as raise the cap for expenditures for the HCF. While EveryoneOn supports and encourages the expansion of affordable internet access in all forms, it is our experience that the presence of broadband internet in the home is paramount. While other forms of internet access, such as public internet or mobile internet, may lead to increased use, it is the presence of home internet that can directly affect the economic and profession trajectory of an individual's life, both of which have direct impacts on health. It is impossible to separate the cause of digital inclusion with the cause of improving health and healthcare in this country.

2. Convene a Working Group of Diverse Stakeholders in Order to Encourage Innovation and Creativity in Developing Broadband Strategies for Expanding Access and Use of Telehealth

As a leading nonprofit in the field of digital inclusion, EveryoneOn has been privileged to work with a wide variety of stakeholders and has seen the benefit of such cooperation. With that in mind, EveryoneOn recommends that the Connect2Health Task Force form a Connectivity and Care Working Group to support their efforts by (a) acting as a general advisory body for the Task Force, (b) recommending rule and/or policy changes to further this cause by the end of 2017, and (c) identifying and implementing pilot projects that seek to advance the intersection of connectivity and healthcare, with assistance and funding from the FCC.

¹ <http://www.diabetes.org/advocacy/news-events/cost-of-diabetes.html?referrer=https://www.google.com/>

In order to ensure that recommendations, advice, and pilot projects reflect the needs of various parties, including end users or beneficiaries of any new technology or programs, it is recommended that this working group be comprised of several stakeholders taken from various categories including, but not limited to:

- Nonprofit organizations and community-based organizations in the digital inclusion space (such as EveryoneOn, SHLB, and the National Digital Inclusion Alliance (NDIA))
- Innovative start-ups in the healthcare space that leverage mobile and broadband internet (Such as Robin Health and GOMO Health)
- Established private-sector players with expertise in healthcare (such as the Advisory Board)
- Government bodies (particularly the U.S. Department of Veterans Affairs, the U.S. Department of Defense, the U.S. Department of Health and Human Services, and the U.S. Department of Housing and Urban Development)
- Community-level healthcare access organizations
- Telecom bodies (ISPs such as Cox, T-Mobile, and Google Fiber).

This body should be convened semiannually and work closely with the Connect2Health Task Force regularly as it seeks to advance healthcare access through connectivity, particularly in the areas the FCC has identified as the Priority 100 and Rural 100. The Connectivity and Care working group would benefit strongly from SHLB's proposed NPRM, which would enhance the ability of the C2H Task Force to affect policy decisions.

3. Develop Proof Points to Demonstrate the Impact of Home Broadband on Healthcare and Reduction in Healthcare Costs

As mentioned above, the application of even simple telehealth applications such as remote patient monitoring can have wide-reaching impacts on both patient health and reductions in overall healthcare costs. In order to fully explore every possible application of telehealth, it is recommended that the FCC should commit to funding various proof points that would demonstrate reduction in overall costs as well as opportunities to increase patient agency to improve their own health.

In 2013, the University of Mississippi demonstrated the power of basic internet connectivity by providing 100 low-income diabetes patients with internet-enabled tablets pre-loaded with health monitoring software. The purpose of this study was to illustrate the power of combining digital literacy, access to affordable internet in the home, and remote patient monitoring as a way to reduce expenditures on diabetes. The results

were strongly encouraging: in the first six months of the program, there were zero hospitalizations or ER visits and the hospital saved over \$330,000 in expenditures as a result.²

This study represents the exact sort of efforts that should be identified and supported by the proposed Working Group and be advanced with support from the C2H Task Force and the FCC.

In summary:

- EveryoneOn strongly endorses recommendations 1, 5, 8, and 9 from SHLB's list of comments
- EveryoneOn strongly implores the FCC to re-approve the nine LBPs whose approval was revoked in early 2017 as well as reinstate the Federal LBP approval process
- EveryoneOn recommends the FCC create a Connectivity and Care Working Group to support the Connect2Health Task Force's efforts by providing advice, policy recommendations, and direction towards identifying potential proof points of the impact of connectivity on healthcare
- EveryoneOn recommends the FCC, in concert with the C2H Task Force and with support from the Connectivity and Care Working Group, identify, support, and fund pilot programs and research initiatives that aim to demonstrate the power of intersecting healthcare and home broadband connectivity.

Respectfully submitted,



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